

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

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ANIBAL GUTAMA,

Plaintiff,

-against-

WHITESTONE AIR INC., KONSTANTINA BISCARDI  
a/k/a KONSTANTINA TEGERIDES, and  
MICHAEL TEGERIDES,

Defendants.  
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Civil Action No.:  
23-CV-2802-ENV-PK

**DECLARATION  
IN SUPPORT**

I, Yale Pollack, declare under penalty of perjury, and pursuant to 28 U.S.C. §1746, that the following is true and accurate:

1. I am the principal of the Law Offices of Yale Pollack, P.C., attorneys for Plaintiff Santiago Catalan (“Plaintiff”). As such, I have personal knowledge of the facts set forth herein.

2. I respectfully submit this Declaration in support of Plaintiff’s motion for a default judgment against Defendants. Specifically, this Declaration is submitted to provide the supplemental materials requested by the Court in its July 3, 2024 Order (the “Order”).

3. On July 10, 2024, pursuant to the Order, the undersigned served a copy of the default motion with supporting papers upon Defendants at their last known residence and place of business, being 149-44 15<sup>th</sup> Drive, Whitestone, New York, 11357. *ECF No. 18*.

4. The address listed is the one contained on the Secretary of State’s website, which also appears to be a personal residence of the individual defendants based on additional research, including Google maps. Plaintiff is not aware of any other addresses for Defendants.

5. Plaintiff has also performed an investigation as to whether the individual defaulting parties are in the military. After entering performing research, including entering their names into

the database <https://scra.dmdc.osd.mil/scra/#/home>, no results came up for the individual defendants being in the military.

6. Finally, I am annexing as Exhibit “1” the contemporaneous time records to support the claim for attorneys’ in this action, as per the Court’s Order.

7. I declare under penalty of perjury that the foregoing is true and accurate.

Dated: July 18, 2024  
Syosset, New York

/s/ Yale Pollack  
**YALE POLLACK**

Date	User	Matter Number	Work Type	Description	Actual	Billable
11/16/2023	Yale Pollack	2023-00273-Gutama v. Whitestone Air	Draft	Draft plaintiff's motion for a default judgment	2	2
				Finalize the Complaint for filing with the Court; draft Civil Cover Sheet and Proposed Summonses; finalize and file opening case documents with the Court		
4/14/2023	Yale Pollack	2023-00273-Gutama v. Whitestone Air	Draft		1.8	1.8
				Review file, including notes, cancelled checks, work orders and other documents from the client to prepare the Complaint; draft Complaint based on the information and documents provided by the client; correspondence with the client re: draft of the Complaint for review and approval for filing		
4/4/2023	Yale Pollack	2023-00273-Gutama v. Whitestone Air	Draft		3.8	3.8
TOTAL					7.6	7.6